

## **Exhibit B**

NEW HEARING DATE AND TIME: May 20, 2015 at 10:00 a.m. (Eastern Time)

ORIGINAL HEARING DATE AND TIME: April 8, 2015 at 10:00 a.m. (Eastern Time)

OBJECTION DEADLINE: March 30, 2015 at 4:00 p.m. (Eastern Time)

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	
Debtors.	:	
-----	X	

**ORDER GRANTING MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE  
QUESTIONNAIRES PURSUANT TO SECTION 107(A) OF THE BANKRUPTCY CODE**

Upon the Motion for an Order to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the "Motion"),<sup>1</sup> dated March 19, 2015 of Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, and on behalf of its affiliates (collectively, "Lehman"), together with the Official Committee of Unsecured Creditors (the "Creditors Committee," and together with Lehman "Movants"); and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, Loretta C.J.); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the motion having been provided in accordance with the procedures set forth in the Second Amended Order Implementing Certain Notice and Case Management Procedures entered June 17, 2010 [Dkt. No 9635] (the "Case Management Order") to (i) the United States Trustee for the Southern District of New York; (ii) the attorneys

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<sup>1</sup> Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed thereto in the Motion.

for the Official Committee of Unsecured Creditors; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) all parties who have requested notice in these chapter 11 cases; and (vii) all parties who previously submitted a Derivative Questionnaire; and it appearing that no other or further notice need be provided; and the Court having reviewed and considered the Motion and any exhibits filed in support thereof; and in response to various objections and comments from parties that previously submitted Derivative Questionnaires and contacted the Movants concerning the Motion on or before April 15, 2015 (collectively, the “Objecting Parties”, and each, an “Objecting Party”), the Movants having filed a reply in support of the Motion (the “Reply”) in which Movants agreed to limit the effect of the interim relief granted by this order approving the Motion to all parties other than the Objecting Parties, that is, the “Non-Objecting Parties”<sup>2</sup>; and the Court having determined that the relief sought in the Motion, as modified herein, is in the best interest of all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore; it is

ORDERED that the Motion is granted on the terms and conditions set forth herein; and it is further

ORDERED that the Non-Objecting Parties that previously submitted Derivative Questionnaires shall be deemed to have provided their consent to the public disclosure of their Derivative Questionnaires (and any supporting materials) and the information contained therein, which may be filed with the Court without being sealed in connection with any Lehman-related adversary proceeding or claim objection litigation; and it is further

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<sup>2</sup> A list of the Non-Objecting Parties is annexed to the Reply as Exhibit A.

ORDERED that, notwithstanding anything to the contrary in the Bar Date Order, Movants are authorized to use and produce the Derivative Questionnaires (and supporting materials) of the Non-Objecting Parties as discovery materials in any Lehman-related adversary proceeding or claim objection litigation on the terms and conditions set forth herein; and it is further

ORDERED that this Order shall be effective and enforceable immediately upon entry; and it is further

ORDERED that this Order is without prejudice to the rights of the Litigation Respondents to seek additional discovery from Movants; and it is further

ORDERED that this Court retains jurisdiction to interpret, implement, and enforce the provisions of this Order.

Dated: \_\_\_\_\_, 2015  
New York, NY

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HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE